

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	4:18-CR-00575-1
	§	
JACK STEPHEN PURSLEY	§	
	§	

DEFENDANT’S MOTION FOR CONTINUANCE

TO THE HONORABLE LYNN H. HUGHES:

Comes now the Defendant, Jack Stephen Pursley, and respectfully requests the Court continue the current Order for Presentence Investigation and Sentencing based on the following:

1. The case is currently set for sentencing for March 9, 2020 at 1:30 P.M.
2. The initial Presentence Investigation Report (PSI) was disclosed on January 31, 2020.
3. Late Friday afternoon, the Government requested a copy of the voluminous financial information Mr. Pursley provided to Officer Hart (per her request at the PSI interview). Mr. Pursley does not object to this request. This morning, Officer Hart informed the parties that she must discuss this request with her supervisors.
4. Undersigned counsel is in the midst of capital murder jury selection in Los Angeles (*People of California v. Robert Durst*). If jury selection proceeds as scheduled, testimony will begin in mid-March. Once testimony begins, undersigned counsel will be available to appear on Fridays (trial is dark on Fridays once testimony begins).¹
5. This Motion is not made for the purpose of delay, but in the interests of justice.

Undersigned counsel requests this continuance in order to preserve Mr. Pursley's constitutional right to effective assistance of counsel, due process and due course of law under the Fifth, Sixth and Fourteenth Amendments to the United States Constitution.

WHEREFORE PREMISES CONSIDERED Mr. Pursley respectfully requests this Honorable Court extend the current scheduling order thirty (30) days and set sentencing for a Friday in mid-April or thereafter as is consistent with the Court's docket.

Respectfully submitted,

/s/ Chip B. Lewis

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¹ Please see Exhibit A.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion has been forwarded via email to AUSA Beaty, AUSA Albinson, AUSA Morgan and United States Probation Officer Raegin Hart on the 10th day of February 2020.

_____/s/Chip B. Lewis
CHIP B. LEWIS

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with AUSA Beaty, AUSA Albinson, AUSA Morgan regarding this Motion, and they are OPPOSED.

_____/s/Chip B. Lewis
CHIP B. LEWIS